

# COMM PARTNERS<sup>™</sup> CONNECT

February 26, 2010

Via ECFS

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

Re: Annual 47 C.F.R. S: 64.2009(e) CPNI Certification; EB Docket 06-36  
Annual 64.2009(e) CPNI Certification for 2009  
Date filed: February 24, 2010  
Name of CommPartners covered by this certification: CommPartners, LLC  
and affiliates  
Form 499 Filer ID: 825445  
Name of signatory: Greg Roeper  
Title of signatory: President

Dear Ms. Dortch:

I, Greg Roeper, certify that I am an officer of the company named above, and acting as an agent of CommPartners, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Federal Communication Commission's Customer Proprietary Network Information ("CPNI") rules located at 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that CommPartners is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

CommPartners has not taken actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. CommPartners has not received customer complaints in the past year concerning the unauthorized release of CPNI.

CommPartners represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

If any further information is required, please contact me or our regulatory counsel Kristopher Twomey at 702 367-8647, ext. 1079 or by email at [ktwomey@commpartnersconnect.com](mailto:ktwomey@commpartnersconnect.com).

Sincerely,



Greg Roeper  
CommPartners Holding Corporation



## CPNI Compliance Statement and Operating Procedures of CommPartners, LLC

Pursuant to the requirements contained in *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information; IP-Enabled Services*, CC Docket No. 96-115; WC Docket No. 04-36, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) ("EPIC CPNI Order"),<sup>1</sup> Greg Roeper, President of CommPartners Holding Corporation ("CommPartners") and affiliated entities including CommPartners, LLC, makes the following statement:

CommPartners has established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that CommPartners is compliant with the FCC's customer proprietary network information (CPNI) rules. The purpose of this statement is to summarize CommPartners' policies and procedures designed to safeguard CPNI.

CommPartners has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. CommPartners is engaged in training their personnel as to when they are and are not authorized to use CPNI, and CommPartners has an express disciplinary process in place.

CommPartners uses CPNI for the limited purposes of initiating, rendering, billing, and collecting for telecommunications services, and may use CPNI, if necessary, to protect its property rights. CommPartners does not disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service. CommPartners has established a supervisory review process regarding its compliance with the CPNI rules regarding outbound marketing situations and maintains records for one year. Specifically, sales personnel must obtain

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<sup>1</sup> 47 C.F.R. S: 64.2009(e) states: "A telecommunications carrier must have an officer, as an agent of the carrier, sign and file with the Commission a compliance certificate on an annual basis. The officer must state in the certification that he or she has personal knowledge that the CommPartners has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certification explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart. In addition, the carrier must include an explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI. This filing must be made annually with the Enforcement Bureau on or before March 1 in EB Docket No. 06-36, for data pertaining to the previous calendar year."



supervisory approval of any proposed outbound marketing request for customer approval.

CommPartners has established procedures to verify an incoming caller's identity. CommPartners trains its personnel in both the use of CPNI, and protection of its confidentiality. These procedures are detailed in CommPartners' CPNI Manual. CommPartners also limits the number of employees that have access to customer information and call data.

CommPartners has implemented measures to discover and to protect against unauthorized attempts to access CPNI. CommPartners also has implemented procedures pursuant to which it can track breaches of CPNI, and given such an event will notify the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") in accordance with the FCC's rules. CommPartners will track customer complaints regarding CPNI, notify its customers in accordance with the FCC's rules and will maintain a record of notifications to the USSS, FBI, for the time period specified in the FCC's rules.

CommPartners has not taken any actions (proceedings instituted or petitions filed by a CommPartners at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Pretexters have not attempted to access CommPartners' CPNI. There have been no customer complaints received in the past year concerning the unauthorized release of CPNI.

CommPartners annually submits a CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

A handwritten signature in black ink, appearing to read "Greg Roeper".

Greg Roeper  
President, CommPartners Holding Corporation